

BENJAMIN B. WAGNER  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	No. CR S 10-0223 JAM
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
HODA SAMUEL,	)	STIPULATION AND
CONNIE DEVERS,	)	ORDER FOR CONTINUANCE OF
CHARLES ROBERT MANESS,	)	STATUS CONFERENCE
DANA FAULKNER,	)	
TRACY PAINTER,	)	
YGNACIA BRADFORD,	)	
SEAN PATRICK GJERDE,	)	
NICOLE DAWSON, and	)	
RONALD BURRIS, JR.,	)	Date: January 11, 2011
	)	Time: 9:30 a.m.
Defendants.	)	Hon. John A. Mendez
_____	)	

It is hereby stipulated and agreed to between the United States of America through PHILIP A. FERRARI, Assistant United States Attorney, and defendants HODA SAMUEL, CONNIE DEVERS, CHARLES ROBERT MANESS, DANA FAULKNER, TRACY PAINTER, YGNACIA BRADFORD, SEAN PATRICK GJERDE, NICOLE DAWSON, and RONALD BURRIS, JR., by and through their respective counsel, that the status conference in the above-captioned matter set for Tuesday, October 26, 2010, be continued to Tuesday, January 11, 2011, at 9:30 a.m.

The parties request that the Court exclude from calculation under the Speedy Trial Act the time from the date of the originally set status conference, October 26, 2010, through the date of the status conference set for January 11, 2011, pursuant to 18 U.S.C. §§ 3161(h)(7)(B)(ii) and (iv) [complexity and reasonable time to prepare] (Local Codes T2 and T4). Since the Indictment was filed on June 10, 2010, the government has produced over 46,000 documents to counsel for the defendants. The parties stipulate that the ends of justice are served by the Court excluding such time, so that each defense counsel may have reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). Specifically, each defendant agrees that his or her counsel needs time to review the discovery, investigate the facts underlying this case and seek possible resolution. Additionally, the parties stipulate that the above-captioned case is unusual and complex such that it is unreasonable to expect adequate preparation for pretrial proceedings, or for a potential trial within the time limits established by the Speedy Trial Act.

IT IS SO STIPULATED.

DATE: October 22, 2010 By: /s/ Philip A. Ferrari  
PHILIP A. FERRARI  
Assistant U.S. Attorney

DATE: October 22, 2010 By: /s/ Philip A. Ferrari for  
SCOTT TEDMON  
Counsel for Defendant  
HODA SAMUEL

DATE: October 22, 2010 By: /s/ Philip A. Ferrari for  
MARK REICHEL  
Counsel for Defendant  
CONNIE DEVERS

1 DATE: October 22, 2010 By: /s/ Philip A. Ferrari for  
DONALD HELLER  
2 Counsel for Defendant  
CHARLES ROBERT MANESS

3 DATE: October 22, 2010 By: /s/ Philip A. Ferrari for  
4 THOMAS JOHNSON  
Counsel for Defendant  
5 SEAN GJERDE

6 DATE: October 22, 2010 By: /s/ Philip A. Ferrari for  
MICHAEL PETRIK, JR.  
7 Counsel for Defendant  
8 TRACY PAINTER

9 DATE: October 22, 2010 By: /s/ Philip A. Ferrari for  
ADANTE DE POINTER  
10 Counsel for Defendant  
DANA FAULKNER

11 DATE: October 22, 2010 By: /s/ Philip A. Ferrari for  
MICHAEL BIGELOW  
12 Counsel for Defendant  
13 NICOLE DAWSON

14 DATE: October 22, 2010 By: /s/ Philip A. Ferrari for  
JOSEPH J. WISEMAN  
15 Counsel for Defendant  
YGNACIA BRADFORD

16 DATE: October 22, 2010 By: /s/ Philip A. Ferrari for  
17 MICHAEL E. HANSEN  
18 Counsel for Defendant  
RONALD BURRIS, JR.

19 IT IS SO FOUND AND ORDERED.  
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21 DATED: October 22, 2010  
22 /s/ John A. Mendez  
HON. JOHN A. MENDEZ  
23 UNITED STATES DISTRICT JUDGE  
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